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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
AKRON

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

) INFORMATION

Plaintiff,

)

v.

)

MARK DULIK,

)

Defendant.

)

1:17CR 255

) CASE NO. _____

) Title 18, Section 1957,
United States Code

JUDGE LIOI

MAG. JUDGE LIMBERT

COUNT 1

(Money Laundering – 18 U.S.C. § 1957)

The United States Attorney charges:

On or about October 23, 2013, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MARK DULIK did knowingly engage in and attempt to engage in a monetary transaction affecting interstate commerce in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, to wit: investor N.S. wired approximately \$30,000 to DULIK as an investment in DULIK's fraudulent business, Rework, Inc., which DULIK deposited into Rework's business account ending in 9935 at Huntington National Bank. On or about the same day, DULIK withdrew, and caused to be

withdrawn, approximately \$20,000 of these funds in the form of a check to H.A, an earlier investor in Rework, falsely representing that the funds were a return on their earlier investment from profits of Rework.

All in violation of Title 18, United States Code, Section 1957.

COUNT 2
(Money Laundering – 18 U.S.C. § 1957)

The United States Attorney further charges:

On or about June 20, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MARK DULIK did knowingly engage in and attempt to engage in a monetary transaction affecting interstate commerce in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, to wit: DULIK withdrew, and caused to be withdrawn, approximately \$48,000 of the approximately \$91,770 that investors B.T. and R.W. wired to DULIK as an investment in DULIK's fraudulent business, Rework, Inc., which DULIK deposited into Rework's business account ending in 1597 at Charter One Bank, and then caused the approximate \$48,000 to be wired back to D.S.P., a company owned and operated by B.T. and R.W., falsely representing that the funds were a return on their earlier investment from profits of Rework.

All in violation of Title 18, United States Code, Section 1957.

COUNT 3
(Money Laundering – 18 U.S.C. § 1957)

The United States Attorney further charges:

On or about July 14, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MARK DULIK did knowingly engage in and attempt to engage in a monetary transaction affecting interstate commerce in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, to wit: investor D.S.P. wired approximately \$39,540 as an investment in DULIK's fraudulent business, Rework, Inc., which DULIK deposited in Rework's operating account ending in 1597 at Charter One Bank. Shortly thereafter, DULIK withdrew, and caused to be withdrawn, approximately \$12,500 of these funds for his own personal use.

All in violation of Title 18, United States Code, Section 1957.

COUNT 4
(Money Laundering – 18 U.S.C. § 1957)

The United States Attorney further charges:

On or about July 25, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MARK DULIK did knowingly engage in and attempt to engage in a monetary transaction affecting interstate commerce in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, to wit: DULIK withdrew, and caused to be withdrawn, approximately \$21,000 of the approximate \$36,582 that investors B.T. and R.W. wired to DULIK in the form of two checks as an investment in DULIK's fraudulent business, Rework, Inc., which DULIK deposited into Rework's business account

ending in 1597 at Charter One Bank, and then caused the approximate \$21,000 to be wired to J.D., a prior investor in Rework, falsely representing that the funds were a return on his earlier investment derived from profits of Rework.

All in violation of Title 18, United States Code, Section 1957.

DAVID A. SIERLEJA
Acting United States Attorney

By:


ROBERT E. BULFORD,
Attorney in Charge, Criminal Division
Akron Branch Office